

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

v.

BANK OF NEW YORK, JPMORGAN CHASE, SOCIÉTÉ
GÉNÉRALE and CITIBANK,

Defendants.
----- X

No. 09 Civ. 5900 (RPP)

JPMORGAN CHASE & CO. and JPMORGAN CHASE
BANK, N.A.,

Third-Party Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN ET AL.,

Third-Party Defendants.
----- X

**ANSWER OF CIMB BANK BERHAD TO THE JPMORGAN CHASE PARTIES’
ADDITIONAL AMENDED AND SUPPLEMENTAL THIRD-PARTY COMPLAINT**

Third-Party Defendant CIMB Bank Berhad (“CIMB”), by and through its undersigned attorneys, states as its Answer to and in response to the Additional Amended and Supplemental Third-Party Complaint (the “Complaint”) filed by Third-Party Plaintiffs JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A., that CIMB makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint and respectfully requests that the Court dismiss with prejudice the Complaint as to CIMB.

CIMB expressly reserves all rights to challenge the personal jurisdiction of this Court without assuming the burden of proof of such defenses. Without submitting to the personal jurisdiction of this Court, CIMB further responds as follows:

Nature of the Proceedings

1. Denies knowledge or information concerning the allegations set forth in Paragraph 1 of the Complaint.

2. Denies knowledge or information concerning the allegations set forth in Paragraph 2 of the Complaint.

3. Denies knowledge or information concerning the allegations set forth in Paragraph 3 of the Complaint.

The Third-Party Plaintiffs

4. Denies knowledge or information concerning the allegations set forth in Paragraph 4 of the Complaint.

5. Denies knowledge or information concerning the allegations set forth in Paragraph 4 of the Complaint.

The Third-Party Defendants

6. Denies knowledge or information concerning the allegations set forth in Paragraph 6 of the Complaint.

7. Denies knowledge or information concerning the allegations set forth in Paragraph 7 of the Complaint.

8. Denies knowledge or information concerning the allegations set forth in Paragraph 8 of the Complaint.

9. Denies knowledge or information concerning the allegations set forth in Paragraph 9 of the Complaint.

10. Denies knowledge or information concerning the allegations set forth in Paragraph 10 of the Complaint.

11. Denies knowledge or information concerning the allegations set forth in Paragraph 11 of the Complaint.

12. Denies knowledge or information concerning the allegations set forth in Paragraph 12 of the Complaint.

13. Denies knowledge or information concerning the allegations set forth in Paragraph 13 of the Complaint.

14. Denies knowledge or information concerning the allegations set forth in Paragraph 14 of the Complaint.

15. Denies knowledge or information concerning the allegations set forth in Paragraph 15 of the Complaint.

16. Denies knowledge or information concerning the allegations set forth in Paragraph 16 of the Complaint.

17. Denies knowledge or information concerning the allegations set forth in Paragraph 17 of the Complaint.

18. Denies knowledge or information concerning the allegations set forth in Paragraph 18 of the Complaint.

19. Denies knowledge or information concerning the allegations set forth in Paragraph 19 of the Complaint.

20. Denies knowledge or information concerning the allegations set forth in Paragraph 20 of the Complaint.

21. Denies knowledge or information concerning the allegations set forth in Paragraph 21 of the Complaint.

22. Denies knowledge or information concerning the allegations set forth in Paragraph 22 of the Complaint.

23. Denies knowledge or information concerning the allegations set forth in Paragraph 23 of the Complaint.

24. Denies knowledge or information concerning the allegations set forth in Paragraph 24 of the Complaint.

25. Denies knowledge or information concerning the allegations set forth in Paragraph 25 of the Complaint.

26. Denies knowledge or information concerning the allegations set forth in Paragraph 26 of the Complaint.

27. Denies knowledge or information concerning the allegations set forth in Paragraph 27 of the Complaint.

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30. Denies knowledge or information concerning the allegations set forth in Paragraph 30 of the Complaint.

31. Denies knowledge or information concerning the allegations set forth in Paragraph 31 of the Complaint.

32. Denies knowledge or information concerning the allegations set forth in Paragraph 32 of the Complaint.

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83. Denies knowledge or information concerning the allegations set forth in Paragraph 83 of the Complaint.

84. Denies knowledge or information concerning the allegations set forth in Paragraph 84 of the Complaint.

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92. Denies knowledge or information concerning the allegations set forth in Paragraph 92 of the Complaint.

93. Denies knowledge or information concerning the allegations set forth in Paragraph 93 of the Complaint.

94. Denies knowledge or information concerning the allegations set forth in Paragraph 94 of the Complaint.

95. Denies knowledge or information concerning the allegations set forth in Paragraph 95 of the Complaint.

96. Denies knowledge or information concerning the allegations set forth in Paragraph 96 of the Complaint.

97. Denies knowledge or information concerning the allegations set forth in Paragraph 97 of the Complaint.

98. Admitted.

99. Denies knowledge or information concerning the allegations set forth in Paragraph 99 of the Complaint.

100. Denies knowledge or information concerning the allegations set forth in Paragraph 100 of the Complaint.

101. Denies knowledge or information concerning the allegations set forth in Paragraph 101 of the Complaint.

102. Denies knowledge or information concerning the allegations set forth in Paragraph 102 of the Complaint.

103. Denies knowledge or information concerning the allegations set forth in Paragraph 103 of the Complaint.

104. Denies knowledge or information concerning the allegations set forth in Paragraph 104 of the Complaint.

105. Denies knowledge or information concerning the allegations set forth in Paragraph 105 of the Complaint.

106. Denies knowledge or information concerning the allegations set forth in Paragraph 106 of the Complaint.

107. Denies knowledge or information concerning the allegations set forth in Paragraph 107 of the Complaint.

108. Denies knowledge or information concerning the allegations set forth in Paragraph 108 of the Complaint.

109. Denies knowledge or information concerning the allegations set forth in Paragraph 109 of the Complaint.

110. Denies knowledge or information concerning the allegations set forth in Paragraph 110 of the Complaint.

111. Denies knowledge or information concerning the allegations set forth in Paragraph 111 of the Complaint.

112. Denies knowledge or information concerning the allegations set forth in Paragraph 112 of the Complaint.

113. Denies knowledge or information concerning the allegations set forth in Paragraph 113 of the Complaint.

114. Denies knowledge or information concerning the allegations set forth in Paragraph 114 of the Complaint.

115. Denies knowledge or information concerning the allegations set forth in Paragraph 115 of the Complaint.

116. Denies knowledge or information concerning the allegations set forth in Paragraph 116 of the Complaint.

117. Denies knowledge or information concerning the allegations set forth in Paragraph 117 of the Complaint.

118. Denies knowledge or information concerning the allegations set forth in Paragraph 118 of the Complaint.

119. Denies knowledge or information concerning the allegations set forth in Paragraph 119 of the Complaint.

120. Denies knowledge or information concerning the allegations set forth in Paragraph 120 of the Complaint.

121. Denies knowledge or information concerning the allegations set forth in Paragraph 121 of the Complaint.

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123. Denies knowledge or information concerning the allegations set forth in Paragraph 123 of the Complaint.

124. Denies knowledge or information concerning the allegations set forth in Paragraph 124 of the Complaint.

125. Denies knowledge or information concerning the allegations set forth in Paragraph 125 of the Complaint.

126. Denies knowledge or information concerning the allegations set forth in Paragraph 126 of the Complaint.

127. Denies knowledge or information concerning the allegations set forth in Paragraph 127 of the Complaint.

128. Denies knowledge or information concerning the allegations set forth in Paragraph 128 of the Complaint.

129. Denies knowledge or information concerning the allegations set forth in Paragraph 129 of the Complaint.

130. Denies knowledge or information concerning the allegations set forth in Paragraph 130 of the Complaint.

131. Denies knowledge or information concerning the allegations set forth in Paragraph 131 of the Complaint.

132. Denies knowledge or information concerning the allegations set forth in Paragraph 132 of the Complaint.

Jurisdiction and Venue

133. States that Paragraph 133 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.

134. States that Paragraph 134 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.

Factual Background

135. Denies knowledge or information concerning the allegations set forth in Paragraph 135 of the Complaint.

136. Denies knowledge or information concerning the allegations set forth in Paragraph 136 of the Complaint.

137. Denies knowledge or information concerning the allegations set forth in Paragraph 137 of the Complaint.

138. Denies knowledge or information concerning the allegations set forth in Paragraph 138 of the Complaint.

139. Denies knowledge or information concerning the allegations set forth in Paragraph 139 of the Complaint.

140. Denies knowledge or information concerning the allegations set forth in Paragraph 140 of the Complaint.

141. Denies knowledge or information concerning the allegations set forth in Paragraph 141 of the Complaint.

142. Denies knowledge or information concerning the allegations set forth in Paragraph 142 of the Complaint.

143. Denies knowledge or information concerning the allegations set forth in Paragraph 143 of the Complaint.

144. Denies knowledge or information concerning the allegations set forth in Paragraph 144 of the Complaint.

145. Denies knowledge or information concerning the allegations set forth in Paragraph 145 of the Complaint.

146. Denies knowledge or information concerning the allegations set forth in Paragraph 146 of the Complaint.

147. Denies knowledge or information concerning the allegations set forth in Paragraph 147 of the Complaint.

148. Denies knowledge or information concerning the allegations set forth in Paragraph 148 of the Complaint.

149. Denies knowledge or information concerning the allegations set forth in Paragraph 149 of the Complaint.

150. Denies knowledge or information concerning the allegations set forth in Paragraph 150 of the Complaint.

151. Denies knowledge or information concerning the allegations set forth in Paragraph 151 of the Complaint.

152. Denies knowledge or information concerning the allegations set forth in Paragraph 152 of the Complaint.

153. Denies knowledge or information concerning the allegations set forth in Paragraph 153 of the Complaint.

154. Denies knowledge or information concerning the allegations set forth in Paragraph 154 of the Complaint.

155. Denies knowledge or information concerning the allegations set forth in Paragraph 155 of the Complaint.

156. Denies knowledge or information concerning the allegations set forth in Paragraph 156 of the Complaint.

157. Denies knowledge or information concerning the allegations set forth in Paragraph 157 of the Complaint.

158. Denies knowledge or information concerning the allegations set forth in Paragraph 158 of the Complaint.

159. Denies knowledge or information concerning the allegations set forth in Paragraph 159 of the Complaint.

160. Denies knowledge or information concerning the allegations set forth in Paragraph 160 of the Complaint.

161. Denies knowledge or information concerning the allegations set forth in Paragraph 161 of the Complaint.

162. Denies knowledge or information concerning the allegations set forth in Paragraph 162 of the Complaint, but states that CIMB makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

163. Denies knowledge or information concerning the allegations set forth in Paragraph 163 of the Complaint, but states that CIMB makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

164. Denies knowledge or information concerning the allegations set forth in Paragraph 164 of the Complaint, but states that CIMB makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

First Claim for Relief

165. CIMB repeats and realleges each of its responses set forth above as if fully set forth herein.

166. States that Paragraph 166 of the Complaint states a legal conclusion to which no answer is necessary or appropriate and refers to C.P.L.R. § 5239 for a complete and accurate recitation of its terms and contents.

167. Denies knowledge or information concerning the allegations set forth in Paragraph 167 of the Complaint. To the extent Paragraph 167 states a legal conclusion, no answer is necessary or appropriate.

Second Claim for Relief

168. CIMB repeats and realleges each of its responses set forth above as if fully set forth herein.

169. Denies knowledge or information concerning the allegations set forth in Paragraph 169 of the Complaint, but states that CIMB makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

170. Denies knowledge or information concerning the allegations set forth in Paragraph 170 of the Complaint. To the extent Paragraph 170 states a legal conclusion, no answer is necessary or appropriate.

171. Denies knowledge or information concerning the allegations set forth in Paragraph 171 of the Complaint. To the extent Paragraph 171 states a legal conclusion, no answer is necessary or appropriate.

Third Claim for Relief

172. CIMB repeats and realleges each of its responses set forth above as if fully set forth herein.

173. Denies knowledge or information concerning the allegations set forth in Paragraph 173 of the Complaint. To the extent Paragraph 173 states a legal conclusion, no answer is necessary or appropriate.

The remainder of the Complaint is a prayer for relief to which no response is required. To the extent an answer is deemed required, the prayer for relief is denied in its entirety. All other allegations of the Complaint that are not specifically admitted are denied. CIMB expressly reserves the right to amend and/or supplement this Answer.

AFFIRMATIVE DEFENSES

CIMB asserts the following affirmative defenses. CIMB states the following defenses without assuming the burden of proof of such defenses or conceding that any parties to the action have any claims or rights as to CIMB. CIMB further reserves the right to assert other affirmative defenses as discovery proceeds.

First Defense

The Court does not have personal jurisdiction over CIMB.

Dated: New York, New York
December 21, 2011

ALLEN & OVERY LLP

By: /s/ Jacob S. Pultman
Jacob S. Pultman
Reginald B. Schafer
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 610-6300
Fax: (212) 610-6399
jacob.pultman@allenovery.com
reggie.schafer@allenovery.com

*Attorneys for Third-Party Defendant
CIMB Bank Berhad*